

UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF NORTH CAROLINA

SHAUNA WILLIAMS, et al.,

*Plaintiffs,*

v.

REPRESENTATIVE DESTIN HALL, in his official capacity as Chair of the House Standing Committee on Redistricting, et al.,

*Defendants.*

Civil Action No. 23 CV 1057

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NORTH CAROLINA STATE CONFERENCE OF THE NAACP, et al.,

*Plaintiffs,*

v.

PHILIP BERGER, in his official capacity as the President Pro Tempore of the North Carolina Senate, et al.,

*Defendants.*

Civil Action No. 23 CV 1104

**WILLIAMS PLAINTIFFS' NOTICE OF SECOND AMENDED COMPLAINT FOR DECLARATORY AND INJUNCTIVE RELIEF**

Pursuant to Federal Rule of Civil Procedure 15(a)(2), *Williams* Plaintiffs notice the filing of an amended complaint in this matter. The Second Amended Complaint removes *Williams* Plaintiffs' racial gerrymandering claim, which was previously Count I. A redline showing the changes from the operative First Amended Complaint is attached as Exhibit

A. Legislative Defendants and State Board Defendants have consented to the filing of the Second Amended Complaint in writing.

*Williams* Plaintiffs filed their Complaint on December 4, 2023, ECF No. 1, and an Amended Compliant on March 4, 2024, ECF No. 30. State Board Defendants and Legislative Defendants filed their Answers to the Amended Complaint on March 15 and 18, 2024, respectively. ECF Nos. 32, 33. In the interest of streamlining the issues for trial, *Williams* Plaintiffs amend their complaint now to dismiss their racial gerrymandering claim with prejudice and update residency information for one plaintiff.

A party may amend its complaint under Federal Rule of Civil Procedure 15(a)(2) “with the opposing party’s written consent.” Fed. R. Civ. P. 15(a)(2). Legislative Defendants and State Board Defendants both consented in writing on April 25, 2025. And because *Williams* Plaintiffs’ Second Amended Complaint does not contain any new allegations or counts that are not already in their current operative complaint, amending their complaint will not prejudice Defendants. Defendants have agreed that they will not file any renewed motions under Rule 12 or Rule 56 in response to *Williams* Plaintiffs’ Second Amended Complaint. The Answers already filed by State Board Defendants, ECF No. 32, and Legislative Defendants, ECF No. 33, will serve as Answers for *Williams* Plaintiffs’ Second Amended Complaint.

*Williams* Plaintiffs’ Second Amended Complaint will be filed separately and will serve as *Williams* Plaintiffs’ operative complaint as of the date of this Notice.

Dated: April 28, 2025

/s/ Narendra K. Ghosh  
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*\* Special Appearance pursuant to  
Local Rule 83.1(d)*

## CERTIFICATE OF SERVICE

I certify that on April 28, 2025, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all counsel of record.

/s/ Abha Khanna  
Abha Khanna